

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

HUCKLEBERRY ULBRICHT,

Plaintiff,

v.

Case No. 3:23-cv-00623

THE CITY OF MAUSTON, DENNIS
NIELSEN, RANDALL REEG, NICOLE
LYDDY, BRANDON ARENZ,

Defendants.

BRIEF IN SUPPORT OF MOTION TO EXTEND PERIOD TO ANSWER OR
OTHERWISE RESPOND PURSUANT TO FED. R. CIV. P. 6(b)(1)A

The Defendants, City of Mauston, Dennis Nielsen, Randall Reeg, Nicole Lyddy and Brandon Arenz, by their attorneys, Stafford Rosenbaum LLP, file this Brief in Support of their Motion to Extend Period to Answer or otherwise respond pursuant to Fed. R. Civ. P. 6(b)(1)A. The Defendants respectfully request that the Court enter an Order to extend the time periods to file an answer or otherwise respond by 14 days.

The basis of this Motion is set forth as follows:

1. On September 26, 2023, Stafford Rosenbaum LLP appeared for the Defendants, City of Mauston, Dennis Nielsen, Randall Reeg, Brandon Arenz and Nicole Lyddy. (Declaration of Pahoua Thao (“Thao Decl.”), ¶ 3); (Dkt. 8).

2. After filing our notice of appearance, we obtained information that caused us to conclude that we should withdraw from the representation consistent with the rules of professional responsibility. (Thao Decl., ¶ 4).

3. Due to this, the Defendants will have to find new counsel to represent them. (Thao Decl., ¶ 5).

4. New counsel will need time to learn the facts of the case and consult with their clients. (Thao Decl., ¶ 6).

5. The Defendants (City of Mauston, Dennis Nielsen, Randall Reeg and Nicole Lyddy) were served on September 12, 2023. (Thao Decl., ¶ 7); (Dkts. 4-7).

6. The Defendants' (City of Mauston, Dennis Nielsen, Randall Reeg and Nicole Lyddy) response to the complaint is due on October 3, 2023. (Thao Decl., ¶ 8).

7. Defendant Brandon Arenz was served on September 18, 2023. (Thao Decl., ¶ 9).

8. Defendant Brandon Arenz's response is due on October 9, 2023. (Thao Decl., ¶ 10).

Based on the information above, we respectfully request that the Court grant an extension of 14 days for new counsel for the Defendants to Answer or otherwise respond to Plaintiff's Complaint. We respectfully request that the due date for the City of Mauston, Dennis Nielsen, Randall Reeg and Nicole Lyddy to file an answer or otherwise respond be extended to October 17, 2023. We also respectfully request that Brandon Arenz's due date to file an answer or otherwise respond be extended to October 23, 2023.

Dated: September 26, 2023.

STAFFORD ROSENBAUM LLP

Electronically signed by Pahoua Thao

Pahoua Thao, SBN 1098421

Attorneys for Defendants

222 West Washington Avenue, Suite 900

Post Office Box 1784

Madison, Wisconsin 53701-1784

Email: pthao@staffordlaw.com

608.256.0226